

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

**Ajax Materials Corporation
P.O. Box 7058
Troy, MI 48007**

ATTENTION:

**Mark Boden
Vice President**

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Ajax Materials Corporation to submit certain information about the facility at 8744 S. Inkster Road, Romulus, MI 48174.

Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us according to the schedule in Appendix B.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Ajax Materials Corporation owns and operates an emission source at the Romulus, MI facility. We are requesting this information to determine whether your emission source is complying with the New Source Performance Standards for Hot Mix Asphalt Facilities (40 C.F.R. Part 60, Subpart I).

Ajax Materials Corporation must send all required information to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

Ajax Materials Corporation must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B, for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards, and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term “emissions data.”

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Ajax Materials Corporation to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Cindy Schafer at 312-353-3108.

Date

2/11/16

George T. Czerniak
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for “image over text” to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should

allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disc, flash drive, or other similar item.
4. Provide a table of contents for each compact disc or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disc or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the claimed CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, or New Source Performance Standards for Hot Mix Asphalt Facilities at 40 C.F.R. Part 60, Subpart I.

1. The terms “document” and “documents” shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. The terms “relate to” or “pertain to” (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.

Appendix B

Information You Are Required to Submit to EPA

Ajax Materials Corporation must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a) for the facility located at 8744 S. Inkster Road, Romulus, MI 48174 ("Ajax Plant 5" or "Facility") in accordance with the schedule specified below:

Items 1 through 11 and Item 16	Within 45 days of receiving this request.
Items 12 through 15	Within 90 days of receiving this request.
Item 17	Not fewer than 14 days before testing.
Item 18	Within 30 days of completion of testing.

For items 3 through 10, the relevant time period for the requested information is January 1, 2012, to the date of this information request.

1. Provide a list of emission units and fugitive emission sources at the Facility. For each emission unit, include the date construction commenced, the date operation commenced, the capacity of the unit, and all associated emission controls.
2. For the fabric filter(s) that controls particulate matter emissions from the unit identified in Permit to Install No. 310-06B as EUHMAPLANT, provide a description of the fabric filter(s) and the normal fabric filter operating conditions including:
 - a. Type of fabric filter;
 - b. Design specifications;
 - c. Operating scenarios;
 - d. Operation and maintenance manual;
 - e. Number of compartments in the fabric filter;
 - f. Number of bags in each compartment of the fabric filter;
 - g. Bag cleaning, rapping, or blowing frequency;
 - h. Hopper emptying frequency; and
 - i. Maintenance conducted and maintenance frequency.
3. Provide all records related to which compartments in the fabric filter were in use at any given time for all fabric filters that controlled particulate matter emissions from EUHMAPLANT. If records of air flow rate through each compartment are available, the Facility shall submit these records in a Microsoft Excel spreadsheet or other compatible format. If these records are not already available, the Facility shall submit information describing in full how each fabric filter is operated under all operating scenarios, when each operating scenario occurred during the time

period January 1, 2012, to the date of this information request, and any other information that shows which compartments in each fabric filter were in use at any given time.

4. Provide copies of all excess emission reports submitted to the Michigan Department of Environmental Quality (MDEQ), as required by Permit No. 310-06B, Appendix B, Item 5.
5. For the fabric filter(s) that controls particulate matter emissions from EUHMAPLANT, provide in a Microsoft Excel spreadsheet or compatible format, provide the daily pressure drop readings, as required by Permit No. 310-06B, Appendix B, Item 1. For any pressure drop reading less than 2 inches, water gauge, or greater than 10 inches, water gauge, provide an explanation as to why the pressure drop was outside the range and any corrective actions taken.
6. For each instance that the high temperature sensor alarm on the EUHMAPLANT fabric filter(s) was triggered, identify the date and time that the alarm was triggered, all corrective actions taken, and the date and time that the fabric filter(s) inlet temperature returned to the allowable temperature range.
7. For the fabric filter(s) that controls particulate matter emissions from the EUHMAPLANT, provide copies of the fabric filter inspection records, as required by Permit No. 310-06B, Appendix B, Item 8, including, but not limited to, black light inspections, as well as the inventory of filter bags, as required by Permit No. 310-06B, Appendix B, Item 7.
8. Provide records of each and every visible emission observation on the EUHMAPLANT stack.
9. Provide, in a Microsoft Excel spreadsheet or other compatible format, the daily recycled asphalt pavement (RAP) throughput and the daily virgin aggregate throughput in tons per day. For days when the EUHMAPLANT was not operating, include a statement indicating that the EUHMAPLANT was not operating. Provide the 12-month rolling sum for RAP throughput in tons per year and the 12-month rolling sum virgin aggregate throughput in tons per year.
10. Provide, in a Microsoft Excel spreadsheet or other compatible format, the daily production of total hot mix asphalt (HMA) at EUHMAPLANT, in tons per day. For days when EUHMAPLANT was not operating, include a statement indicating that EUHMAPLANT was not operating.
11. Provide, in a Microsoft Excel spreadsheet or other compatible format, the calculated actual annual emissions for each emission unit and fugitive source at the Facility for the years 2012, 2013, 2014, and 2015. Include example calculations, all emission factors used, and the source for each emission factor.

12. Within 90 days of the date of this information request, the Facility shall conduct a performance test in accordance with an approved testing protocol to quantify the particulate matter (PM) concentration from EUHMAPLANT using EPA Reference Method 5. The sampling time and sample volume for each test run shall be at least 60 minutes and 0.90 dscm (31.8 dscf), respectively.
13. Within 90 days of the date of this information request, the Facility shall conduct a performance test in accordance with an approved testing protocol to quantify stack opacity from EUHMAPLANT using EPA Reference Method 9, or an approved alternative method.
14. During the testing required by Items 12 and 13, above, the Facility shall operate the hot mix asphalt plant, EUHMAPLANT, at maximum production rates and under representative conditions.
15. During the testing required by Items 12 and 13, above, the Facility shall document and record, at a minimum, the following operating conditions:
 - a. Aggregate processed, tons per hour;
 - b. RAP processed, tons per hour;
 - c. Asphalt cement processed, tons per hour;
 - d. Total HMA produced, tons per hour;
 - e. Fuel type and usage, gallons per hour;
 - f. HMA discharge temperature, °F;
 - g. Fabric filter inlet temperature, °F;
 - h. Fabric filter pressure drop, inches of water column;
 - i. Fabric filter cleaning cycle frequency;
 - j. Number of sections in fabric filter that are operating;
 - k. Damper position, % open; and
 - l. Burner position, % open.
16. Within 45 days of receipt of this request, the Facility shall submit to EPA a proposed testing protocol for the testing required by Items 12 and 13, above, that completely describes the methods and procedures for testing the EUHMAPLANT emissions in accordance with 40 C.F.R. §§ 60.8, 60.11, and 60.93 and 40 C.F.R. Part 60, Appendix A. The test protocol shall identify, in tons per hour, the targeted HMA production rate during the test, and the fabric filter(s) operating scenario.
17. Not fewer than 14 days prior to the planned test date(s), the Facility shall submit notification to EPA of its intent to perform emission testing. The notification shall include the scheduled date(s) for the tests. The Facility should submit this notice via email to: Schafer.Cynthia@epa.gov

18. Within 30 days after the completion of the tests required by Items 12 and 13, above, the Facility shall submit a complete report of the emissions testing. The test report shall include, at a minimum, the following:
- a. Summary of Results
 - i. Results of the above specified emission tests;
 - 1. For PM, in gr/dscf and lb PM/ton HMA
 - 2. For opacity, highest 6-minute average opacity
 - 3. For opacity, number of 6-minute averages that exceed 20%
 - ii. Process data identified in Item 15 above;
 - iii. Discussion of test errors;
 - iv. Discussion of any deviations from the reference test methods; and
 - v. Production data, including the total amount of HMA produced during each test run.
 - b. Facility Operations
 - i. Description of the processes and control equipment in operation;
 - ii. Operating parameters of the process units, fabric filter, and related equipment at the time of the test; and
 - iii. Facility operating parameters that demonstrate that the process units were operated at maximum production rates at the time of testing.
 - c. Sampling and Analytical Procedures
 - i. Sampling port location(s) and dimensions of cross-section;
 - ii. Sampling port description, including labeling system;
 - iii. Brief description of sampling procedures, including equipment and diagram;
 - iv. Description of sampling procedures (planned and accidental) that deviated from any standard method;
 - v. Brief description of analytical procedures, including calibration;
 - vi. Description of analytical procedures (planned or accidental) that deviated from any standard method; and
 - vii. Quality control and quality assurance procedures, test, and results.
 - d. Appendix
 - i. Complete results with example calculations;
 - ii. Raw field data (original, not computer printouts);
 - iii. Laboratory report, with signed chain-of-custody forms;
 - iv. Calibration procedures and results;
 - v. Raw process and control equipment data, signed by plant representative;
 - vi. Test log;
 - vii. Project participants and titles; and
 - viii. Related correspondence.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the Request to Provide Information as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential **by page, paragraph, and sentence**. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, **explain with specificity** why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, **you bear the burden of substantiating your confidentiality claim.** Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I, Kathy Jones, certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by Certified Mail, Return Receipt Requested, to:

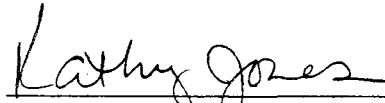
Mark Boden
Ajax Materials Corporation
P.O. Box 7058
Troy, MI 48007

I also certify that I sent a copy of the Request to Provide Information Pursuant to the Clean Air Act by First-Class Mail to:

Tom Hess, Enforcement Unit Manager
Michigan Department of Environmental Quality
Air Quality Division
525 West Allegan
P.O. Box 30242
Lansing, MI 48909

Mina McLemore
Michigan Department of Environmental Quality
Detroit District
3058 West Grand Blvd Suite 2-300
Detroit, MI 48202-6058

On the 4th day of April 2016.



Kathy Jones, Program Technician
AECAB, PAS